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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

KARL STORZ ENDOSCOPY-)
 AMERICA, INC.,)
)
 Plaintiff,)
)
 v.)
)
 STRYKER CORPORATION and)
 STRYKER COMMUNICATIONS, INC.,)
)
 Defendants.)

Case No. CV 14-00876 RS

**STIPULATION AND ~~PROPOSED~~
 ORDER ALTERING DEADLINE
 RELATED TO PATENT L.R. 4-4**

Pursuant to Civil Local Rules 6-1(b) and 7-12, Plaintiff Karl Storz Endoscopy-America, Inc. (“KSEA”) and Defendants Stryker Corporation and Stryker Communications, Inc. (collectively, “Stryker”), by and through their respective undersigned counsel, hereby stipulate to and jointly request that the deadline for taking discovery relating to claim construction and complying with Patent L.R. 4-4 be extended to March 31, 2015. The accompanying declaration of Michael A. Lavine sets forth all requirements of Civil Local Rule 6-2, including identifying all previous time modifications in the case. For the Court’s convenience, the Parties will not repeat all information contained in Mr. Lavine’s declaration, but the Parties do note as follows:

1. Under the current schedule, the deadline for the Parties to complete discovery relating to claim construction pursuant to Patent L.R. 4-4 is February 27, 2015. (Doc. 110.) Now that the deadline for the parties to file responsive claim construction briefs has been continued to April 8, 2015 (Doc. 124), the Parties jointly request that the schedule be modified to provide the Parties with additional time to complete discovery relating to claim construction, which will include several expert depositions. This will make the claim construction discovery period more efficient, allow the Parties more flexibility to accommodate the schedules of their expert witnesses, and potentially avoid the expense of taking the depositions in the event that the Court grants Stryker’s Motion to Stay. Accordingly, the Parties jointly request that the deadline for claim construction discovery be moved to March 31, 2015. Thus, the Parties’ request would extend the deadline for claim construction discovery by four weeks and four days.

2. This stipulated extension will not alter any other deadlines currently set by the Court.

3. Pursuant to Civil Local Rule 6-2(a), this stipulation is accompanied by the Declaration of Michael A. Lavine setting forth (1) the reasons for the requested enlargement of time; (2) all previous time modifications in this case; and (3) the effect of the requested enlargement of time.

Respectfully submitted,

Dated: February 25, 2015

REED SMITH LLP

/s/ William R. Overend
William R. Overend (SBN 180209)
Attorneys for Defendants,
STRYKER CORPORATION and
STRYKER COMMUNICATIONS, INC.

Dated: February 25, 2015

BECK, BISMONTÉ & FINLEY, LLP

/s/ Alfredo A. Bismonte¹
Alfredo A. Bismonte
Attorneys for Plaintiff,
KARL-STORZ ENDOSCOPY AMERICA, INC.


¹ In compliance with Civil Local Rule 5-1(i), I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories hereto.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

- The Parties have until March 31, 2015 to take discovery relating to claim construction and to comply with Patent L.R. 4-4.

Dated: February 26, 2015


Honorable Richard G. Seeborg
United States District Judge